

UNITED STATES DISTRICT COURT  
DISTRICT OF SOUTH CAROLINA  
SPARTANBURG DIVISION

JANE DOES 1-9,  
Plaintiffs,  
vs.

Case No.: 7:20-cv-00947

COLLINS MURPHY, et al.  
Defendants.

**DECLARATION OF CONSTANTINOS CHRISTOFOROU**

Constantinos Christoforou being duly sworn, does hereby depose and state:

1. My name is Constantinos Christoforou. Unless otherwise stated, I make this affidavit of my own personal knowledge.
2. I am a Director of Wisebits IP, Ltd. (“WIP”).
3. WIP is incorporated in Cyprus, with its principal place of business in Limassol, Cyprus.
4. WIP does not – in any way, shape, or form – own or operate the xHamster.com website.
5. WIP owns and maintains certain intellectual property including software, technology and/or computer code related to Hammy Media and the xHamster.com website.
6. Contrary to the allegations in the complaint, WIP does not conduct business in the United States or South Carolina.
7. WIP does not now have an office in South Carolina, nor has it ever had an office in South Carolina.

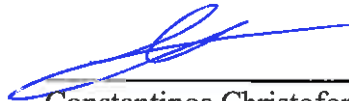
8. WIP does not have an office in the United States, nor has it ever had an office in the United States.

10. WIP does not have (and has never had) any employees in South Carolina or the United States.

11. WIP does not maintain a bank account in South Carolina or the United States, nor has it ever had such an account.

12. WIP does not pay taxes in South Carolina or the United States, nor has it ever done so.

Signed under the pains and penalties of perjury this 23 day of December, 2022.

  
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Constantinos Christoforou, Director  
Wisebits IP, Ltd.